

Kelly H. Dove, Esq.
Nevada Bar No. 10569
Holly E. Cheong, Esq.
Nevada Bar No. 11936
SNELL & WILMER L.L.P.
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, NV 89169
Telephone: (702) 784-5200
Facsimile: (702) 784-5252
kdove@swlaw.com
hcheong@swlaw.com

Attorneys for Defendant Wells Fargo Bank, N.A.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

EDWARD PATRICK FLAHERTY, an
individual,

Plaintiff,

vs.

WELLS FARGO BANK, NATIONAL
ASSOCIATION dba WELLS FARGO
BANK NA; and DOES 1-50, ROES 51-100,

Defendants.

Case No. 3:22-cv-00025-MMD-CLB

**DECLARATION OF HOLLY E.
CHEONG, ESQ. IN SUPPORT OF
REPLY IN SUPPORT OF MOTION
TO STAY DISCOVERY**

I, Holly E. Cheong, Esq., declare as follows:

1. I am over eighteen (18) years of age. I am competent to testify to the facts stated herein, which are based on personal knowledge unless otherwise indicated, and if called upon to testify, I could and would testify competently to the following.

2. I am an attorney at the law firm of Snell & Wilmer L.L.P., and counsel of record for Defendant Wells Fargo Bank, N.A. ("Wells Fargo") in this action.

3. I make this declaration in support of Wells Fargo's Reply in Support of Motion to Stay Discovery.

4. On February 9, 2022, the Parties in this litigation conducted their telephonic Rule 26(f) conference in compliance with the Federal Rules of Civil Procedure and this Court's Local

1 Rules. I attended on behalf of Wells Fargo and Jonathan D. Blum attended on behalf of Plaintiff
2 Edward Patrick Flaherty (“Flaherty”).

3 5. At the Rule 26(f) conference, I agreed that Wells Fargo would follow this Court’s
4 standard 180-day discovery period with the caveat that Wells Fargo is reserving all rights should
5 its Motion to Stay Discovery, ECF No. 11, be granted. Flaherty’s counsel acknowledged this and
6 agreed that the joint discovery plan and scheduling order would include that reservation of Wells
7 Fargo’s rights under its pending Motion to Stay Discovery.

8 6. At the Rule 26(f) conference, the Parties discussed discovery and agreed that most
9 of the documents sought by Flaherty contain personal financial information that will require
10 redaction and a protective order.

11 I declare under penalty of perjury that the foregoing is true and correct.

12 Dated this 22nd day of February 2022.

13
14 /s/ Holly E. Cheong
15 HOLLY E. CHEONG, ESQ.
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **DECLARATION OF HOLLY E. CHEONG, ESQ. IN SUPPORT OF REPLY IN SUPPORT OF MOTION TO STAY DISCOVERY** by method indicated below:

- ☐ **BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).
- ☐ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.
- ☐ **BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight delivery service company for delivery to the addressee(s) on the next business day.
- ☐ **BY PERSONAL DELIVERY:** by causing personal delivery by, a messenger service with which this firm maintains an account, of the document(s) listed above to the person(s) at the address(es) set forth below.
- ☒ **BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.
- ☐ **BY EMAIL:** by emailing a PDF of the document listed above to the email addresses of the individual(s) listed below.

DATED this 22nd day of February, 2022.

/s/ Maricris Williams
An employee of SNELL & WILMER L.L.P.

4874-2565-0448